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**BY ECF**

The Honorable Victor Marrero  
 United States District Court, Southern District of New York  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007  
[ChambersNYSDMarrero@nysd.uscourts.gov](mailto:ChambersNYSDMarrero@nysd.uscourts.gov)

RE: Securities and Exchange Commission v. Stone et al., 22 Civ. 3553 (VM)

Dear Judge Marrero:

Pursuant to Rule II.H of the Court's Individual Practices, Standing Order 19-MC-583, and Section 6 of the Southern District of New York Electronic Case Filing Rules & Instructions, we write on behalf of defendant John Robson to seek leave to file under seal Exhibit 2 to Mr. Robson's recently filed letter to the Court (ECF No. 103). Should the Court grant this request, Mr. Robson submits that plaintiff Securities and Exchange Commission should be granted access to the sealed exhibit.

The exhibit, which was provided to the Court via email and will be filed on ECF under seal pending the Court's ruling on this Motion, is a copy of the Accounting with respect to Mr. Robson's assets, which was prepared pursuant to Court order. The Accounting contains sensitive personal financial information specific to Mr. Robson. Mr. Robson's privacy interest in this information is sufficient to overcome the presumption of public filing. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–20 (2d Cir. 2006). Additionally, this information is not the type of information that, if sealed, will impact the judicial process or deprive the public of needed information. *See id.*

Accordingly, Mr. Robson respectfully requests the Court grant him leave to file Exhibit 2 under seal.

Sincerely,

/s Jason H. Cowley  
 Jason H. Cowley  
 Roy G. Dixon III  
 McGuireWoods LLP  
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*Counsel for John D. Robson*

CC: Counsel of Record

Request GRANTED.

SO ORDERED.

Dated:

September 20, 2022

New York, New York



Victor Marrero  
U.S.D.J.